

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEBRA SCOTT,)	
)	
Plaintiff,)	Case No.: 4:21-cv-00057
)	
v.)	JURY TRIAL REQUESTED
)	
TARGET CORPORATION,)	Removed from Circuit Court of
)	St. Louis County, Missouri
Defendants.)	

NOTICE OF REMOVAL

COMES NOW Defendant, TARGET CORPORATION, by and through its attorneys, BETH C. BOGGS and BOGGS, AVELLINO, LACH & BOGGS, L.L.C., pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1446, and for its Notice of Removal, states to the Court as follows:

1. This action entitled Debra Scott v. Target Corporation was commenced in the Circuit Court of St. Louis County on or about December 2, 2020.
2. The attached Petition was served upon Target Corporation on December 15, 2020.
3. Upon information and belief, Defendant states that Plaintiff is a resident of St. Louis County and a citizen of St. Louis County, as pled in Plaintiff's Petition, ¶ 4.
4. Defendant, Target Corporation, is incorporated in the State of Minnesota and has its principal place of business in the State of Minnesota. Thus, for purposes of diversity, Defendant is a citizen and resident of the State of Minnesota.

5. Defendant asserts that complete diversity exists, as Defendant is a citizen of the State of Minnesota and a resident of the State of Minnesota, and has its principal place of business in the State of Minnesota. See 28 U.S.C. § 1332(c)(1).

6. This is an action over which the Court has original jurisdiction under the provisions of 28 U.S.C. § 1332, in that the matter in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.00 and is between citizens of different states. The Plaintiff claims injuries to her head and neck. See Plaintiff's Petition, ¶ 11. She claims that those injuries are permanent, disabling, and progressive. Her attorney has asserted a demand in the amount of \$350,000.00.

7. Copies of all processes, pleadings, orders, records, and proceedings in St. Louis County are attached to this Notice of Removal.

9. Defendant has filed this Notice of Removal within thirty (30) days after the service of the Petition, from which it was first ascertained that the case was removable.

WHEREFORE, Defendant, Target Corporation, respectfully requests that this Court acknowledge jurisdiction over this action and allow removal thereto to this Court for the determination of all issues involved herein.

DEFENDANT DEMANDS TRIAL BY JURY

Respectfully submitted,

TARGET CORPORATION

By: /s/ Beth C. Boggs

Beth C. Boggs, #43089

BOGGS, AVELLINO, LACH & BOGGS, L.L.C.

9326 Olive Blvd., Suite 200

St. Louis, MO 63132

(314) 726-2310 Telephone

(314) 726-2360 Facsimile

bboggs@balblawyers.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was electronically filed with the Clerk of the United States District Court, Eastern District of Missouri, by using the Court's CM/ECF Electronic Filing System this 14th day of January, 2021, with an electronic copy to be served by e-mail upon the following:

John L. Wilbers, #51848
The Wilbers Law Firm, LLC
130 S. Bemiston, Suite 406
St. Louis, MO 63105
(314) 721-3040 Telephone
(314) 721-3052 Facsimile
filings@thewilberslawfirm.com
Attorney for Plaintiff

Patricia A. Hook